

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al.	:	Case No. C-1-02-467
	:	
Plaintiffs,	:	Judge Beckwith
	:	Magistrate Judge Hogan
v.	:	
	:	
AK STEEL CORPORATION	:	FOURTH DECLARATION OF
	:	<u>PHYLLIS SHORT</u>
	:	
Defendant.	:	

Phyllis Short truthfully declares that she is competent to testify if called and she further truthfully states of her own personal knowledge as follows:

1. I am the Director – Human Resources for AK Steel Corporation. I have been employed by the Company for approximately 39 years. I submitted earlier declarations in this matter dated November 14, 2002, November 30, 2005, and September 6, 2007.

2. The last application that AK Steel received from Vivian Bert was in May 2001. AK Steel has no record of receiving applications from Bert in April or May 2002.

3. AK Steel has no record of receiving an application from Edward James Lewis in November 2001.

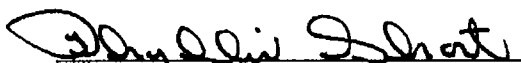
4. Michael Miller applied in the fall of 2001. He passed the pre-employment exam on October 3, 2001. His background check revealed that he had eight points on his driving record, his license had been suspended and he had been caught driving with a suspended license. Jessica Morris consulted with me concerning the results of his background check. This type of

driving record raises concerns about the applicant's reliability and his ability and desire to follow rules and act in a safe manner. If an applicant does not act safely when operating his own vehicle, I cannot trust that he will act safely when operating or working around AK Steel's equipment. I will not approve hiring an applicant with an extremely poor driving record. We decided not to hire Miller based on the results of the background check.

5. AK Steel has no record of receiving applications from Michael Miller in June 2001 or January 2002.

I declare under penalty of perjury that the foregoing is true and accurate.

Signed this 11 day of January, 2008.


Phyllis Short